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April 5, 2005

VIA E-MAIL & U.S. MAIL

John H. Goolsby, Esq.
Consumer Justice Center
342 East County Road D
Little Canada, Minnesota 55117

**RE: *Peggy Marie Schmitt v. Chase Manhattan Bank NA, et al.*
*District of Minnesota; Case No. 03-3295***

Dear Mr. Goolsby:

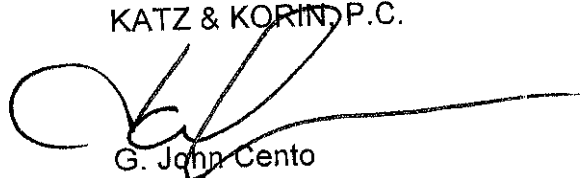
I am responding to your letter of March 30, 2005. I will be brief since it appears from our correspondence on this issue that no amicable resolution is likely.

I simply disagree that the deposition topic related to policies and procedures for compliance with 15 U.S.C. 1681e(b) required Trans Union to prepare Mr. Stockdale to testify specifically about the accuracy of the reporting of FUSA, Saks, FDR or any other furnisher. The topic you cite is a broad topic and, therefore, Mr. Stockdale was prepared to discuss broad questions related to that broad topic – not specific questions related to specific topics which you had failed to describe. Also, for the record I never said that a furnisher's reliability has nothing to do with Trans Union's policies and procedures for compliance with 1681e(b). Finally, as stated in my letter of March 28, 2005, you had ample opportunity to seek discovery on the reliability of these Trans Union furnishers but failed to do so.

Discovery is now closed in this case and, therefore, for all the reasons set forth in this letter and in my previous letter, we will be unable to produce a witness in response to your Notice dated March 24, 2005.

Sincerely,

KATZ & KORIN, P.C.



G. John Cento